

171672

May 15, 1985

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Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Springfield, IL 62706

Attention: Rama K. Chaturvedi, Manager  
Permit Program Development Unit  
Permit Section

Reference: 0430300003 - DuPage County/Log #FA 133  
Downers Grove/Rexnord ILD 005 455 571

Gentlemen:

Responsive to the January 25, 1985 letter from Lawrence W. Eastep to Rexnord concerning the Closure Plan for the above-referenced facility, please find enclosed herewith a revised Closure Plan for the facility. Also enclosed is a copy of a letter from the facility to the USEPA - Region V requesting withdrawal of its Part A TSD permit application and a copy of a letter to the IEPA certifying that an underground storage tank that had been a portion of its storage facility has been properly closed, plus a letter from Petrochem Services, Inc., the company that performed the cleanup.

Briefly stated, the above-referenced Rexnord facility has determined that it does not need to accumulate hazardous wastes on-site for greater than 90 day periods and that some portions of its Part A application relate to operations that were not properly included therein. Accordingly, this facility has requested the USEPA to withdraw its application for a TSD permit, but, until that occurs, this facility intends to continue to comply with the regulations relating to TSD facilities having Interim Status.

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If you have any questions regarding the revised Closure Plan or any statements in this letter, please do not hesitate to contact Rexnord about them.

Very truly yours,

Rexnord Inc.

Aaron L. Hardt  
Environmental Counsel  
Legal Department  
(414)797-5687

Enc.

cc: M. Haney (attachments)

/crb

ALH:0515004R

bcc: R. Fuys (Bearing)  
J. Lorenzen (CH)  
R. Muehl (CH)  
V. Smith (CH)

May 1, 1985

### CLOSURE PLAN

This Closure Plan is for Rexnord Inc. - Bearing Operation at 2400 Curtiss Street, Downers Grove, Illinois, 60515.

The Closure Plan calls for complete removal of all hazardous wastes and contaminated residues. Therefore, post-closure care is not required. By adherence to this Closure Plan, the need for further maintenance of this facility will be minimized and post-closure escape of hazardous waste constituents, leachate, contaminated rainfall or waste decomposition products to the ground or surface waters or to the atmosphere will be controlled, minimized or eliminated to the extent necessary to protect human health and the environment, because all hazardous waste will have been removed from the facility.

The maximum inventory is defined as the total volume of wastes which could be present if all permitted tanks and containers were full. The maximum inventory of S01 is 400 gal. and the maximum inventory of S02 is 13,000 gal. The maximum inventory of wastes in treatment is 3,600 gal.

The expected year of closure is unknown, because this facility can be operated indefinitely. If this facility is closed, however, it is estimated that the activities described in this Plan will be completed in four weeks.

The method of closure and estimated closure costs is provided on the following page.

Rev. May 1, 1985

## CLOSURE PLANS

### PARTIALLY NEUTRALIZED Cu PLATING WASTE-CLOSURE PLAN

In the event the Plating Department was to be closed down, all tanks would be drained and cleaned. Cyanide containing solutions would be treated in the batch cyanide treatment tank and acid base solutions would be treated in the batch acid treatment tank. The chrome rinse and neutral rinse systems would be treated in the batch acid tank. The Cy rinse system would be treated in the batch cyanide treatment tank. The cleaner tank's contents would be dumped in the usual manner or treated in the batch cyanide treatment tank. Sludge generated would be accumulated and hauled to an EPA approved site. The empty tanks would be further washed until all hazardous waste residues were removed.

Remaining unused chemicals would be treated, transferred to other divisions within Rexnord with plating operations, or returned to the supplier.

#### Estimated Cost of Closure:

Treatments:	Batch Acid	\$3,800.00
	Batch Alkaline	3,900.00
Sludge Hauling:		8,300.00
Raw Material Disposal:		2,500.00
Clean out tanks (contract out):		<u>2,000.00</u>
	Total:	\$20,500.00

## CLOSURE PLANS (Cont'd)

### SOLVENT, COOLANT, OIL AND WATER CLOSURE PLAN

The underground tank contents have been pumped out and hauled away to the EPA approved site. The tank was cleaned and disposed of in accordance with EPA procedures. Certification of proper closure of this tank was mailed to IEPA in May, 1985. The cost to remove the underground tank was approximately \$16,000. This cost is not included in the Closure Plan since it has been paid.

Three 2,500 gallon above-ground tanks have been ordered as replacements. The cost estimate for removal of these tanks is provided below.

#### Estimated Cost of Closure:

Pump out tanks, 2500 gal. each	
haul, and dispose: \$700/Load x 3	\$2,100.00
Clean out tanks (contract out):	<u>2,000.00</u>
Total:	\$4,100.00

#### TOTAL Estimated Closure Cost:

Copper Plating Waste	\$20,500.00
Solvent, Coolant, Oil & Water	4,100.00
Engineering Certification	<u>1,000.00</u>
TOTAL:	<u>\$25,500.00</u>